

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Docket No. 05-10933 MLW

MARISSA VOLLER, JOHN VOLLER,
and KATHLEEN VOLLER,
Plaintiffs

v.

BRIDGEWATER-RAYNHAM REGIONAL
SCHOOL DISTRICT, RONALD P.
GERHART, STEPHEN G. HEASLIP,
DAVID A. CHUCKRAN, BETTE A.
BRIDGES, a/k/a BETTE A. BRIDGES-BRODY,
and WILLIAM R. BARBER,
Defendants

LOCAL RULE 16.1(D) JOINT STATEMENT

The parties submit the following Joint Statement in accordance with LR 16.1(D):

A. Joint Discovery Plan

1. The parties shall satisfy their Automatic Disclosure obligations within thirty (30) days after the Court rules on the Defendants' Motion to Dismiss.
2. All written discovery shall be served within one hundred twenty (120) days after the Court rules on the Defendants' Motion to Dismiss.

3. All depositions shall be completed within one hundred eighty (180) days after the Court rules on the Defendants' Motion to Dismiss.
4. The Plaintiffs shall designate their expert witnesses within two hundred ten (210) days after the Court rules on the Defendants' Motion to Dismiss. The Defendants shall designate their expert witnesses within two hundred forty (240) days after the Court rules on the Defendants' Motion to Dismiss.
5. The parties agree that discovery shall be limited in accordance with LR 26.1(C), but that a party may request additional discovery in accordance with LR 26.2(B).

B. Motion Schedule

1. Any motions for joinder or amendment shall be filed within one hundred twenty (120) days after the Court rules on the Defendants' Motion to Dismiss.
2. All dispositive motions shall be filed within two hundred forty (240) days after the Court rules on the Defendants' Motion to Dismiss.

C. Trial by Magistrate Judge

The parties do not consent to trial by magistrate.

D. Agenda for Scheduling Conference

1. Hearing on Defendants' Motion to Dismiss.

2. Discussion of Defendants' response to Plaintiff's settlement proposal in accordance with LR 16.1(C).
3. Discussion of potential conflict of interest in one attorney or law firm representing all of the Defendants.

E. LR 16.1 Certifications

The certifications required by LR 16.1 (D) (3) shall be filed separately by the parties.

Respectfully submitted,

Plaintiffs,

By their attorneys,

/s/ David J. Paliotti

David J. Paliotti, Esquire
BBO No. 547501
GREENBAUM, NAGEL,
FISHER & HAMELBURG
200 High Street, 4th Floor
Boston, MA 02110
(617) 423-4300

Defendants,

By their attorneys,

/s/ William P. Breen, Jr.

William P. Breen, Jr., Esquire
BBO No. 558768
MURPHY, HESSE, TOOMEY
& LEHANE, LLP
300 Crown Colony Drive, Suite 410
Quincy, MA 02269-9126
(617) 479-5000